

AO91 (Rev. 12/03) Criminal Complaint

FELONY

AUSA

United States Courts

## UNITED STATES DISTRICT COURT

Southern District of Texas  
FILED

June 12, 2025

Southern District Of Texas Brownsville Division

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

vs.

Case Number: 1:25-MJ-489

Reymundo IBARRA-De La Cruz

A200 211 663 Mexico

AKA Reymundo Ibarra DE LA CRUZ, Reymundo De La Cruz

IBARRA

I, the undersigned complainant state that the following is true and correct to the best of my

knowledge and belief. On or about June 10, 2025 in Cameron County, inthe Southern District Of Texas defendant(s)

an alien who had previously been denied admission, excluded, deported, or removed, knowingly and unlawfully was present in the United States having been found in Cameron County, Texas, the said defendant having not obtained the consent of the Attorney General or the Secretary of the Department of Homeland Security to reapply for admission into the United States,

in violation of Title 8 United States Code, Section(s) 1326(a)(1)I further state that I am a(n) Border Patrol Agent and that this complaint is based on the

following facts:

The defendant was encountered by Border Patrol agents conducting Linewatch operations near Brownsville, Texas on June 10, 2025. The defendant is a citizen and national of Mexico who was previously deported, excluded or removed from the United States on April 29, 2025. Record checks revealed that the defendant has not applied for permission from the proper Authorities to re-enter the United States.

Defendant possessed no funds at the time of arrest.

Continued on the attached sheet and made a part of this complaint:

☐ Yes ☒ No

Signature of Complainant

Torres, Jesus Border Patrol Agent

Printed Name of Complainant

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P.4.1, on

June 12, 2025

Date

at

Brownsville, Texas

City/State

Karen Betancourt

U.S. Magistrate Judge

Name of Judge

Title of Judge

Karen Betancourt  
Signature of Judge